



U.S. Department of Justice

Michael J. Sullivan
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District of Massachusetts

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Suite 9200
Boston, Massachusetts 02210

June 9, 2005

Charles Rankin, Esq.
One Commercial Wharf
Boston, MA 02110

Re: U.S. v. Gregory Wright

Dear Counsel:

In response to your letter dated June 9, 2005, the government responds as follows:

a. The government does not possess any statement made orally or in writing by any person which is inconsistent with any statement made orally or in writing by any witness that the government anticipates calling at the suppression hearing.

The government does not possess any statements orally or in writing made by witnesses who were interviewed and which are inconsistent with the report of SA Rudnicki or with her testimony at the Grand Jury.

The government does not have a copy of the detention hearing testimony transcript.

b. The government does not possess any information that would cast doubt upon the admissibility of evidence, including the firearm seized from the Defendant.

c. The government is not aware of any prosecutable federal offense committed by any witness the government anticipates calling at the hearing.

d. With respect to evidence admissible pursuant to Fed.R.Evid.608(b), there is no information requiring disclosure.

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e. The government does not possess any inconsistent statement or description of such a statement made orally or in writing by a witness whom the government anticipates calling at the hearing.

f. In accordance with its established policy, the government requested from those agencies whose agents will be witnesses at the hearing, the following categories of information:

a) any finding of misconduct that reflects upon the truthfulness or possible bias of the individual; b) any past or pending criminal charge brought against the individual; c) any credible allegation of misconduct that reflects upon the truthfulness or possible bias of the individuals that is the subject of a pending investigation; d) any allegations which could not be substantiated, were found to be not credible, or have resulted in the exoneration of the individual insofar as those allegations 1) reflect upon the truthfulness or bias of the individual and 2) were made on or after December 9, 1996, and a) were made by a prosecutor, magistrate judge or judge or b) received publicity.

The government does not possess any information which requires disclosure.

Very truly yours,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/Nadine Pellegrini
Nadine Pellegrini
Assistant U.S. Attorney